

May 19, 2005

Maine Organic Farmers and Gardeners Association is writing to support the NOSB Livestock Committee Recommendation for Guidance on Pasture Requirements document in principle. We feel that the organic community (farmers and consumers) expect that dairy cows be raised on pasture, whenever it is agronomically possible.

<flushboth>we feel that The Organic System Plan shall have the goal of providing grazed feed greater than 30% of total dry matter intake on a daily basis during the growing season, but not less than 120 days. However, dry matter calculations are difficult to do daily on the farm. So we suggest that the Organic System Plan shall also include an alternative goal of not feeding more than 50% of the diet, on an as fed basis, from conserved forages during the growing season, but not less than 120 days. This method of measurement is more usable for the farmer. It would be an onerous task for many of the farmers and certifiers to calculate feed on a dry matter basis. The recommendation is in keeping with dairy business definitions used by Cornell University and the University of Wisconsin, which define grazing farms as those that provide at least 30 to 40 percent of dry matter from foraging pasture during the grazing season.

The NOSB has made reference to the regional Natural Resources Conservation Service (NRCS) Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan. Upon review of the Prescribed Grazing Practice Standard, both at the national and regional levels, the standard appears to provide a good general framework for ecologically sustainable livestock grazing. However, the practice standard documents themselves do not provide any specific measurements that would be useful determining appropriate stocking rates or other important grazing details for a local area. Instead, it appears that the NRCS Prescribed Grazing Specification Guide (Code 528) provides a more appropriate level of detail. Therefore, we recommend that the NOSB recommendation in this regard be amended to read: "Appropriate pasture conditions shall be determined in accordance with the regional Natural Resource Conservation Service Conservation Practice Standards AND SPECIFICATION GUIDES for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan." (The new proposed text is capitalized).

</flushboth>MOGFA supports in full the section stating, The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system. This gives the farmers the understanding that this is a goal that they are working towards, not that they have to achieve immediately. The goal must be achievable with the land base that they use or plan to use.

Lack of enforcement, on some operations, of the current Rule requirement for the pasturing of ruminants, including lactating dairy cows, has led to the necessity for the inclusion of the above numerical standards in the guidance document. Without clear, definitive wording, the intent of the Rule, with regards to pasture, will continue to be disregarded by some. This wording gives certifiers an explicit minimum amount of grazing intake and minimum

allowable grazing season that will serve as a clear-cut trigger/guide in their certification process.

We firmly believe requiring significant pasture intake for ruminants, as this document promotes, represents a sustainable agricultural system, providing multiple benefits to the animals, environment and the consumers of organic products. Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity. Ruminants with access to pasture help ensure an organic production system that provides living conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care benefits, and improves humane animal care and their welfare.

These benefits are passed down to consumers through more nutritious milk. A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having room to graze and a diet high in fresh grass and clover, and forage.

Allowing cows to go to their feed rather than bringing feed to the cows substantially reduces the use of non-renewable resources and machinery required for feed transportation and ecological manure recycling. Responsible active management of quality pasture is an excellent way to improve soil quality. Careful management of pasture ensures maximum utilization and capture of solar energy, the basis of growing food.

We support the NOSB pasture guidance document and thank you for including clear, definitive minimums. The standards for organic farms and food marketed under the USDA organic seal must not be compromised.

Sincerely,

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